PRIVILEGE LOG PRODUCTION OF NOVEMBER 21, 2006

																								<u>DOC.</u> #
Notes re: addresses of Foote, Fugere, Rython	Notes re: script for telephone calls to Park Street Diner employees	Notes re: addresses of Foote, Norman, Peacock		Notes re: Kenneth Waters investigation		Documents and transcript review		Notes re: Perry's address			Notes of Kenneth Waters inteview			Notes of Kenneth Waters interview		Notes re: instructions for Perry sworn statement		Notes re: sworn testimony (4 pages)		Notes of Perry interview		Notes re: Peggy Larger		DESCRIPTION
		1/26/84									8/5/83									7/15/83		4/18/86	DOCUMENT	DATE OF
Attorney Work Product	Attorney Work Product (Fed. R. Civ. P. 26(b)(3))	Attorney Work Product (Fed. R. Civ. P. 26(b)(3))	(Fed. R. Civ. P. 26(b)(3))	Attorney Work Product	(Fed. R. Civ. P. 26(b)(3))	Attorney Work Product	(Fed. R. Civ. P. 26(b)(3))	Attorney Work Product	(Fed. R. Civ. P. 26(b)(3))	Attorney-Client Privilege	Attorney Work Product;	(Fed. R. Civ. P. 26(b)(3))	Attorney-Client Privilege	Attorney Work Product;	(Fed. R. Civ. P. 26(b)(3))	Attorney Work Product	(Fed. R. Civ. P. 26(b)(3))	Attorney Work Product	(Fed. R. Civ. P. 26(b)(3))	Attorney Work Product	(Fed. R. Civ. P. 26(b)(3))	Attorney Work Product	PRIVILEGE	EXPLANATION OF

defendants' possession		
without notes in		
Copy of transcript		DeSimone's notes.)
(Fed. R. Civ. P. 26(b)(3));		notes on it (privileged claimed solely with respect to
Attorney Work Product		Transcript of Probable Cause Hearing with DeSimone's
notes already produced		
Copy of report without		respect to DeSimone's notes.)
(Fed. R. Civ. P. 26(b)(3));		DeSimone's notes on it. (Privileged claimed solely with
Attorney Work Product		State Police Laboratory Report dated July 28, 1980 with
(Fed. R. Civ. P. 26(b)(3))		
Attorney Work Product		
Attorney-Client Privilege;		Transcript of interview of Kenneth Waters
(Fed. R. Civ. P. 26(b)(3))	,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,	
Attorney Work Product		Notes re: Waters investigation
(Fed. R. Civ. P. 26(b)(3))		
Attorney Work Product	7/3/84	Notes re: questions to ask Millington
(Fed. R. Civ. P. 26(b)(3))		
Attorney Work Product		
Attorney-Client Privilege;	5/8/84	Notes of call to Kenneth Waters
(Fed. R. Civ. P. 26(b)(3))		
Attorney Work Product		Notes re: addresses of Foote, Fugere, Ruthen
(Fed. R. Civ. P. 26(b)(3))		
Attorney Work Product		Notes re: locating fingerprint evidence (2 pages)
26(b)(3))		
Product (Fed. R. Civ. P.		DeSimone's notes.)
due to Attorney Work		notes on it. (Privileged claimed solely with respect to
Produced with redactions		List of Park Street Diner employees with DeSimone's
(Fed. R. Civ. P. 26(b)(3))		employee who gave Waters ride home
Attorney Work Product		Notes re: Brow's lie detector test, description of
(Fed. R. Civ. P. 26(b)(3))		
Attorney Work Product		
Attorney-Client Privilege:	2/22/84	Notes of conversation with Kenneth Waters
(Fed. R. Civ. P. 26(b)(3))		

Attorney Work Product		CHOIEMCA CHAIL SHIMINOIDS
(Fed. R. Civ. P. 26(b)(3))		Their and draft assessment
Attorney Work Product		Unsigned draft order
(Fed. R. Civ. P. 26(b)(3))	//15/85	signed affidavit
(Fed. R. Civ. P. 26(b)(3))		
Attorney Work Product		Case law re: motion to compel attendance of witness
(Fed. R. Civ. P. 26(b)(3))		
Attorney Work Product	5/21/??	Phone message from Annette Correa
(Fed. R. Civ. P. 26(b)(3))		summons to Perry
Attorney Work Product	7/19/85	Correspondence from DeSimone to Peters re: order and
(Fed. R. Civ. P. 26(b)(3))		
Attorney Work Product		
Attorney-Client Privilege;	8/5/85	Correspondence from DeSimone to Elizabeth O'Connor
(Fed. R. Civ. P. 26(b)(3))		Providence area news reporters
Attorney Work Product	1/23/86	Correspondence from DeSimone to Peters re:
(Fed. R. Civ. P. 26(b)(3))		appeal
Attorney Work Product	2/10/86	Correspondence from Peters to DeSimone re: Waters'
(Fed. R. Civ. P. 26(b)(3))		conviction affirmed
Attorney Work Product	4/24/87	Correspondence from Peters to DeSimone re: Waters'
(Fed. R. Civ. P. 26(b)(3))		
Attorney Work Product		
Attorney-Client Privilege;		
redactions due to		re: payment of bill
Document produced with	11/1/85	Correspondence from DeSimone to Elizabeth O'Connor
(Fed. R. Civ. P. 26(b)(3))		
Attorney Work Product		
Attorney-Client Privilege;	5/19/83	Client information
(Fed. R. Civ. P. 26(b)(3))		and the second s
Attorney Work Product		
Attorney-Client Privilege;	8/5/83	Transcript of Interview of Kenneth Waters
(AG002308-2410)		

enlarge	Correspondence	on it	Unsigned motio	reports	Correspondence	DA's Office abo	conversations w	Correspondence			Correspondence				re: payment of bill	Correspondence	Larger	Notes re: motio:	Interstate Witne	Correspondence	hearing	Correspondence	Репу	Correspondence	attendance of ou	Correspondence		Unsigned draft		Unsigned draft	Unsigned draft
	Correspondence from Peters to DeSimone re: motion to		Unsigned motion to enlarge with DeSimone's notations		Correspondence from DeSimone to Bradley re: police	DA's Office about fingerprint comparisons	conversations with Perry, Waters; letters to Bradley and	Correspondence from DeSimone to Peters re:			Correspondence from DeSimone to Elizabeth O'Connor				bill	Correspondence from DeSimone to Elizabeth O'Connor		Notes re: motion before Supreme Judicial Court; Peggy	Interstate Witness Subpoena Act	Correspondence from DeSimone to Peters re: RI		Correspondence from Peters to DeSimone re: Perry		Correspondence from DeSimone re: subpoenas for	attendance of out-of-state witness	Correspondence from Peters to DeSimone re: motion for		Unsigned draft subpoena for Perry (duplicate)		Unsigned draft subpoena for Perry	Unsigned draft summons (duplicate)
	5/14/84				1/13/1984			9/11/84			10/26/84					1/10/85		1/24/85		6/26/85		7/11/85		7/12/85		7/12/85		7/85		7/85	
(Fed. R. Civ. P. 26(b)(3))	Attorney Work Product	(Fed. R. Civ. P. 26(b)(3))	Attorney Work Product	(Fed. R. Civ. P. 26(b)(3))	Attorney Work Product	(Fed. R. Civ. P. 26(b)(3))	Attorney-Client Privilege	Attorney Work Product;	(Fed. R. Civ. P. 26(b)(3))	Attorney Work Product	Attorney-Client Privilege;	(Fed. R. Civ. P. 26(b)(3))	Attorney Work Product	Attorney-Client Privilege;	redactions due to	Document produced with	(Fed. R. Civ. P. 26(b)(3))	Attorney Work Product	(Fed. R. Civ. P. 26(b)(3))	Attorney Work Product	(Fed. R. Civ. P. 26(b)(3))	Attorney Work Product	(Fed. R. Civ. P. 26(b)(3))	Attorney Work Product	(Fed. R. Civ. P. 26(b)(3))	Attorney Work Product	(Fed. R. Civ. P. 26(b)(3))	Attorney Work Product	(Fed. R. Civ. P. 26(b)(3))	Attorney Work Product	Attorney Work Product (Fed. R. Civ. P. 26(b)(3))

Document produced with redactions due to Attorney-Client Privilege;			
Document produced with redactions due to			
Document produced with			
	1/10/85	Itemized time records	
(Fed. R. Civ. P. 26(b)(3))			
Attorney Work Product			
Attorney-Client Privilege;		Notes re: Stone's van; Colorado registration	
(Fed. R. Civ. P. 26(b)(3))			
Attorney Work Product		notes	
Attorney-Client Privilege;	11/7/83-11/9-83	Notes of call to Carolyn Waters re: Angelo DePardo;	
(Fed. R. Civ. P. 26(b)(3))			
Attorney Work Product			
Attorney-Client Privilege;	11/10/83-11/14/83	Notes of call to Kenneth Waters	
(Fed. R. Civ. P. 26(b)(3))		The state of the s	
Attorney Work Product			
Attorney-Client Privilege;	11/30/83	Notes of call to Kenneth Waters	
(CPCS000016)			
notes already produced			
copy of document without			
(Fed. R. Civ. P. 26(b)(3));			
Attorney-Client Privilege		Waters with DeSimone's notes on it	
Attorney Work Product;	12/2/83	Copy of correspondence from O'Neill to Kenneth	
(Fed. R. Civ. P. 26(b)(3))			
Attorney Work Product			
Attorney-Client Privilege;	12/4/83	Notes of call to Kenneth Waters	
(Fed. R. Civ. P. 26(b)(3))			
Attorney-Client Privilege			
Attorney Work Product;;	12/29/83	Correspondence from DeSimone to Kenneth Waters	
(Fed. R. Civ. P. 26(b)(3))			
Attorney Work Product	1/9/84	Notes re: Waters' probation report	
(Fed. R. Civ. P. 26(b)(3))		statement	
Attorney Work Product	1/9/84	Correspondence from DeSimone to Peters re: Perry	

er; 8/1	Attorney Work Product (Fed. R. Civ. P. 26(b)(3))		Perry
s of calls with O'Connell re: car registration; notes ll with Kenneth Waters ll with Kenneth Waters ggraphs with envelope (3 photographs) s re: Marsh; Perry; selling van (2 sides) s re: Taylor's rape accusations against APD officer; on calls to Kenneth Waters (3 pages) s re: Taylor under investigation by AG re: time of Perry interview; notes of calls with mnell, Berry, Kenneth Waters med, unsworn statement from Eric O'Connor re: re: information on Marsh, Kenneth Waters' yment schedule, knowledge of victim (2 pages) of call to Kenneth Waters 7/11/83	A	7/8/??	Phone message from Elizabeth O'Connor re: call from
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graphs with O'Connell re: car registration; notes I with Kenneth Waters graphs with envelope (3 photographs) re: Marsh; Perry; selling van (2 sides) re: Taylor's rape accusations against APD officer; on calls to Kenneth Waters (3 pages) re: Taylor under investigation by AG message from Kenneth Waters; other notes (2		7/15/83-7/29/8	Notes re: time of Perry interview; notes of calls with
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10/3/83-10/17/83			of call with Kenneth Waters
		10/3/83-10/17/	Notes of calls with O'Connell re: car registration; notes

Attorney-Client Privilege; Attorney Work Product (Fed. R. Civ. P. 26(b)(3))		
Attorney Work Product		
Attorney-Client Privilege;		
(red. K. CIV. r. 20(0)(3))	5/12/83	Notes of meeting with Betty Anne Corrente (2 pages)
Tad D City D OCCLYON		
Attorney Work Product		
Attorney-Client Privilege;		Notes of meeting with Betty Anne Corrente (2 pages)
(Fed. R. Civ. P. 26(b)(3))		
Attorney Work Product		Elizabeth O'Connor, Carolyn Waters
Attorney-Client Privilege;	6/20/83	Notes of conference with Betty Anne Corrente,
(Fed. R. Civ. P. 26(b)(3))		
Attorney Work Product	7/8/83	Notes of meeting with O'Connell
(Fed. R. Civ. P. 26(b)(3))		
Attorney Work Product		O'Connell; information about Perry
Attorney-Client Privilege;	6/28/83	Notes of calls to Betty Anne Corrente re: meeting with
(Fed. R. Civ. P. 26(b)(3))		O'Connor re: Perry
Attorney Work Product		calls to O'Connell re: Perry; notes of call to Elizabeth
Attorney-Client Privilege;	7/8/83	Notes of calls from Kenneth Waters re: Perry; notes of
(Fed. R. Civ. P. 26(b)(3))		
Attorney Work Product		Waters re: Perry's alleged rape of paperboy
Attorney-Client Privilege;	5/25/83	Notes of call from Betty Anne Corrente and Leroy
(Fed. R. Civ. P. 26(b)(3))		notes on it
Attorney Work Product	5/26/??	Phone message from Leroy Waters with Desimone's
(Fed. R. Civ. P. 26(b)(3))		
Attorney Work Product	6/9/83	Notes re: trial evidence
(Fed. R. Civ. P. 26(b)(3))		
Attorney Work Product	6/14/83	Notes re: Perry; fingerprint comparisons (3 pages)
(Fed. R. Civ. P. 26(b)(3))		schedule; fingerprint comparison
Attorney Work Product		Notes re: change in Perry's last name; Concord visiting
(Fed. R. Civ. P. 26(b)(3))		
Attorney Work Product	•	Notes re: Concord State Prison
(Fed. R. Civ. P. 26(b)(3))		
Attorney Work Product		Notes re: Perry

Notes re: time card

Attorney-Client Privilege; Attorney Work Product Attorney Work Product

(Fed. R. Civ. P. 26(b)(3))

Document 80-2

Attorney-Client Privilege	11/2/84	Correspondence from Peters to Waters	
(Fed. R. Civ. P. 26(b)(3))		Waters investigation	
Attorney Work Product		Correspondence from O'Connell to DeSimone re:	
(Fed. R. Civ. P. 26(b)(3))		Waters investigation	
Attorney Work Product		Correspondence from O'Connell to DeSimone re:	
(Fed. R. Civ. P. 26(b)(3))		investigation (duplicate)	
Attorney Work Product	10/15/84	Memorandum from O'Connell to DeSimone re: Waters	
(Fed. R. Civ. P. 26(b)(3))		investigation	
Attorney Work Product	10/15/84	Memorandum from O'Connell to DeSimone re: Waters	
(Fed. R. Civ. P. 26(b)(3))			
Attorney Work Product			
Attorney-Client Privilege;	2/27/84	Correspondence from DeSimone to Elizabeth O'Connor	
(Fed. R. Civ. P. 26(b)(3))			
Work Product			
Attorney-Client Privilege;		Kenneth Waters' notes	
(Fed. R. Civ. P. 26(b)(3))			
Work Product			
Attorney-Client Privilege;			
(Fed. R. Civ. P. 26(b)(3));			
Attorney-Client Privilege			